

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.



Cheminova, Inc.  
Oak Hill Park  
1700 Route 23, Suite 210  
Wayne, New Jersey 07470

Phone: 973-305-6600  
Fax: 973-305-1382  
Customer service:  
1-800-548-6113

September 1, 1999

By Federal Express

Mark Hartman, CRM  
Reregistration Branch II  
Special Review and Reregistration Division  
US Environmental Protection Agency  
1921 Jefferson Davis Highway  
Crystal Mall II, Room 266-A  
Arlington, Virginia 22202

Subject: Preliminary Human Health Risk Assessment for Chlorpyrifos  
Response to 30-Day Comment Period

Dear Mr. Hartman:

We are submitting the comments listed below in response to the Preliminary Human Health Risk Assessment for Chlorpyrifos.

Cheminova's products are not included in the Product and Residue Chemistry Chapters of the HED Chapter of the RED. Specific areas where Cheminova's products should be included are as follows:

1. Page 3, Table 1 includes registered MPs of chlorpyrifos. Cheminova Agro A/S has a registered 98.5% technical, Chlorpyrifos Technical EPA Reg. No. 4787-27 that should be included in the table.
2. Page 32, Appendix I contains the current status of the product chemistry data requirements for the MPs listed in Table 1. Cheminova's Chlorpyrifos Technical (EPA Reg. No. 4787-27) should be included in this table.
3. Page 4, Table 2 includes a list of products for which chemistry data have been submitted. Cheminova Agro A/S has submitted product chemistry data for its 98.5% Chlorpyrifos Technical, EPA Reg. No. 4787-27, and therefore, this product and references to its data should be included in the table.
4. Page 7, Table 3 contains a list of chlorpyrifos end-use products with food/feed uses registered to the basic producers, Dow AgroSciences and Y-TEX. These food/feed use patterns are also summarized in Table B (Appendix II). We are unclear as to why only Dow and Y-TEX products are included in this table. Cheminova Agro A/S is also a basic producer, and it's subsidiary, Cheminova, Inc., has the following end-use products registered with food/feed uses: Nufos 4E (EPA Reg. No. 67760-28), Nufos 4E-SG (EPA Reg. No. 67760-27), and Nufos 15G (EPA Reg. No. 67760-14). Please clarify the reasoning for only addressing these two basic producers.

Thank you for taking the time and addressing these concerns. We look forward to your response. If you have any questions please feel free to call me at 973-305-6600.

Sincerely,

Kari E. Mavian  
Regulatory Affairs Manager

